

**UNITED STATES DISTRICT COURT**  
 for the  
**WESTERN District of TEXAS**

**FILED**

May 12, 2022

CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS

United States of America

v.

)

)

)

Case No. SA-22-MJ-00705

Christopher Robert Friedrich

)

)

)

*Defendant(s)*

BY: \_\_\_\_\_ cd

DEPUTY

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 11, 2022 in the county of Bexar in the  
 Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

26 U.S.C. Section 5861(d)

Possession of a destructive device or firearm not registered in the  
 NFRTR.Penalties: Max 10 years imprisonment, \$10,000 fine, 3 years supervised  
 release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

 Continued on the attached sheet.**HEATHER PLUMMER**Digitally signed by HEATHER PLUMMER  
 Date: 2022.05.12 10:18:56 -05'00'*Complainant's signature***Heather Plummer / ATF SA***Printed name and title**Judge's signature***Richard B. Farrer, U.S. Magistrate Judge***Printed name and title*Date: 05/12/2022City and state: San Antonio, Texas

- Sworn to before me and signed in my presence.  
 Sworn to telephonically and signed electronically.

SA-22-MJ-00705

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Heather Plummer, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and has been so employed since September 2020. Since September 2020, your affiant has participated in investigations concerning violations of Title 26.
2. On May 11, 2022, at approximately 3:00 AM, a San Antonio Police Department Officer was dispatched to the 3000 block of Blairstone San Antonio, TX 78247 in response to a sick/injured person in a vehicle in the cul-de-sac. Upon arrival, the Officer observed the vehicle with its brake lights on and therefore parked his patrol vehicle in front of the observed vehicle to prevent it from moving forward. The Officer then observed a male, later identified as **Christopher Robert Friedrich**, a multi-convicted felon, laying back in the front driver's seat with the vehicle in drive and his foot on the brake. The Officer also observed what he believed to be a firearm in between the driver's seat and the center console. While waiting for a backup Officer to arrive, Friedrich's vehicle rolled forward and bumped the SAPD officer's vehicle.
3. A backup Officer arrived, opened the passenger door, and removed the firearm, which was determined to be a toy. Officers then ordered Friedrich out of the vehicle. Friedrich believed he was in downtown San Antonio and claimed to be meeting up with someone that he met online. The Officers asked Friedrich if he was intoxicated or under the influence of any narcotics, to which Friedrich stated that he had smoked CBD Oil. When asked who the vehicle belonged to, Friedrich stated that it was a rental, which he has had for two weeks due to his vehicle being inoperable.
4. When Officers asked for his name, Friedrich stated his last name was Wright and gave two different dates of birth, leaving Officers unable to identify him. Officers then detained Friedrich and advised him that they would be taking him to get him identified. Officers searched Friedrich prior to transport and located a small plastic bag of marijuana in his front right pocket. Officers then advised Friedrich that he was under arrest for possession of marijuana. Once advised that he was under arrest, Friedrich provided his correct name and date of birth to the Officers. Officers then discovered that Friedrich had an active state warrant out of Bexar County for Friedrich for Assault with Bodily Injury of a Family Member/Married/Cohabiting.
5. After arresting Friedrich, Officers began an inventory search of the vehicle and located a white bookbag in the front passenger seat. Inside the bookbag was a long tube wrapped in

electrical tape with what appeared to be a fuse sticking out. When asked about the item, Friedrich began stuttering and stated it was a shaker weight.

6. Based on my training and experience, and the experience of the SAPD Bomb Squad and the ATF CES, I believe that Friedrich's device was a destructive device, specifically, a pipe bomb. The device contained a spent Co2 cartridge, ball bearings of various sizes and compositions, suspected dart tips or arrowheads, small construction staples, and metallic powder consistent with shape texture, size, and color of smokeless powder. A consumer grade "m-style" device, appearing to be used as the detonator, was on the capped end with the fuse threaded through the cap. Based upon the initial evaluation of the device by SAPD Bomb Squad, the device had all the components necessary to be a working bomb.
7. A pipe bomb or a homemade destructive device must be registered in the National Firearms Registration and Transfer Record (NFRTR), which provides a tax stamp. Friedrich does not have any National Firearm Act items registered in his name, including any destructive devices as defined in Title 26 of the United States Code.

Based on the above facts, your affiant believes there is probable cause that **Christopher Robert Friedrich** was in possession of a destructive device or firearm not registered in the NFRTR, in violation of Title 26 U.S.C. Section 5861(d).

HEATHER  
PLUMMER

 Digitally signed by HEATHER PLUMMER  
Date: 2022.05.12 10:19:30 -05'00'

---

Special Agent Heather Plummer  
Bureau of Alcohol, Tobacco, Firearms, and  
Explosives

SUBSCRIBED AND SWORN TO ME THIS \_\_\_\_ DAY OF May 12, 2022.

  
\_\_\_\_\_  
HONORABLE RICHARD B. FARRER  
UNITED STATES MAGISTRATE JUDGE